

BROCK ♦ GUERRA

STRANDMO DIMALINE JONES

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

17339 REDLAND ROAD

SAN ANTONIO, TEXAS 78247-2304

(210) 979-0100 TELEPHONE

(210) 979-7810 FACSIMILE

A.J. DIMALINE IV
 JOHN A. GUERRA
 SCOTT P. JONES ♦♦*
 THOMAS A. MAILLOUX II ■
 ROBERT F. SCHEIHING
 MARK R. STRANDMO ♦
 JASON L. WEST *

ROY C. BROCK (1925-2008)

OF COUNSEL:
 AUDREY A. HAAKE

CAITLIN E. BRATT
 AMANDA E. CAROLLO
 AUGUSTUS T. DENHAM
 KIMBERLY R. GRAVES
 CELIA E. GUERRA
 MICHAEL D. JOY, II
 KIMBERLY A. KAYATTA
 KANON B. LILLEMOM
 FREDERICK SAPORSKY, III

August 1, 2022

Cory Itkin
 ARNOLD & ITKIN, LLP
 6009 Memorial Drive
 Houston, Texas 77007

Email: citkin@arnolditkin.com

Re: Case No. SA-22-CV-0080-XR; *Gillis v. Community Products, LLC*, United States District Court for the Western District of Texas; Our File No. 7840-001.

Dear Cory:

I have reviewed Plaintiffs' written discovery responses and note that Plaintiffs have improperly objected to and/or failed to provide complete responses to several of the discovery requests. Specifically, there are concerns related to the following discovery responses:

- Jennifer Gillis' Answer to Interrogatory Nos. 5, 6, 13, 14, 15 and 17;
- Tory Gillis' Answer to Interrogatory Nos. 11 and 12;
- Estate of J.G.'s Answer to Interrogatory Nos. 14 and 16; and
- Plaintiffs' Responses to Request for Production Nos. 1-13, 16-24, 26-39, 49-51, 53, 58, 60, 61 and 64.

I ask that Plaintiffs amend these discovery responses to remove the improper objections and provide responsive information so that we can have a full understanding of their claims prior to taking their depositions. Please let me know if you can provide the amended discovery responses within the next 14 days. If you have any questions or concerns, or wish to discuss this matter in greater detail, please don't hesitate to contact me.

Sincerely,

BROCK ♦ GUERRA

BY: 

JOHN A. GUERRA
 MARK R. STRANDMO
 CELIA E. GUERRA



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